

In the Matter of RM-10352  
February 7, 2002

To the Commissioners:

I file my comments in OPPOSITION to the Petition for Rulemaking calling for government restrictions by mode on the allocation and use of the 160 meter band.

I can speak with authority about the ability of CW to "get through" tough conditions, and it is that very virtue that undercuts Petitioners stated need for regulation.

In more than 20 years nearly exclusively CW, I worked all states on 160 except Alaska along with, as I recall, 89 countries. I also was active on all the DX contests (CQ & ARRL, both modes).

CW, as I recall, never went more than 8 to 10 kHz above 1825...And phone stayed above 1825. There was a DX window at 1825! Why does CW need more mandated space? The mode is currently allowed over the full band! Surely even during contests or other times of high band occupancy, weak signal workers can find a spot to communicate within.

It is curious that Petitioners took great pains to state in their proposal that "we request that only *Frequencies for Phone* ... be changed." ("Executive Summary," page 1)

This reminds me of the old military crack about the one soldier thinking everyone else is marching out of step.

If Petitioners desire relief from outside interference, let them propose something showing their own willingness to bring something to the table, e.g., limits on the range of spectrum allowed for "contests," or perhaps asking for themselves a more modest, scheduled protected segment established only during certain hours of the day on weekends. The precedent for this is the old "quiet hours" the FCC sometimes imposed to cure complaints with the neighbors.

I fully support voluntary band plans, and it is that system that for so long has brought the mantle "gentleman's band" to 160. Petitioners themselves have conceded the mixed mode sharing of space has "*served ... pretty well*," (page 2),

and that they *"usually coexist quite well (in accordance with the existing ARRL bandplan)"* (page 3).

So what's the point of this proposal? Why not spend the energy promoting the revised ARRL band plan, where the Petitioners played a major development role. It is always possible to later revisit the issue if there is enough continued interest in weak-signal Morse Code to make consideration worthwhile.

I am among the many who have moved on to "phone" operation, and am part of a group with many common interests with those who pursue weak-signal Morse Code. The operation of my vintage AM station, which has included a homebrew rig I constructed in 1947, often presents me with finding the same clear spot on the band that the Petitioners fear they also may someday lose.

Our group's challenge, compared to Petitioners far-off speculation about the future, has existed for years as we deal with interference and lack of coordination with other modes and activities. We have handled this with a consistent effort to portray the activity as fun, interesting, and worth exploring. The popularity of AM, on vintage gear and on modern rigs, shows that a positive campaign can work.

Petitioners, on the other hand, apparently are trying to create a massive mess of generated comments in this forum to force-feed the FCC and press their case for "protection." That's not a very positive approach, and won't win many friends.

I am NOT in favor of FCC-set restrictions in emission modes. This goes for all our authorized amateur bands.

Respectfully submitted,

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